

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RALPH S. JANVEY, IN HIS CAPACITY AS §
COURT-APPOINTED RECEIVER FOR THE §
STANFORD INTERNATIONAL BANK, LTD., §
ET AL. §

Plaintiff, §

v. §

JAMES R. ALGUIRE, ET AL. §

Relief Defendants. §

Case No. 03:09-CV-0724-N

AGREED MOTION TO DISMISS WITH PREJUDICE (WASHINGTON)

Pursuant to Rule 41 of the Federal Rules of Civil Procedure, Plaintiff Ralph S. Janvey, in his capacity as Court-appointed Receiver for Stanford International Bank, Ltd. and Stanford Group Company, et al., and Relief Defendants Dewayne Washington and the Dewayne Washington Revocable Trust submit this agreed Motion to Dismiss, with Prejudice and without costs, all claims by Plaintiff against Relief Defendants Dewayne Washington and the Dewayne Washington Revocable Trust in the above-referenced case.

PRAYER

The parties have resolved their disputes and respectfully request that all claims by Plaintiff against Relief Defendants Dewayne Washington and the Dewayne Washington Revocable Trust in the above-referenced case be dismissed, with prejudice and without costs, and that the Court enter the attached Agreed Order of Dismissal.

Dated: January 21, 2010

Respectfully submitted,

BAKER BOTTS L.L.P.

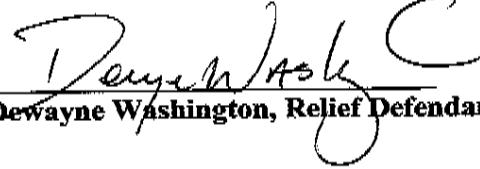
By: /s/ Kevin M. Sadler

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ATTORNEYS FOR RECEIVER RALPH S. JANVEY

Agreed:


Dewayne Washington, Relief Defendant

CERTIFICATE OF SERVICE

On January 21, 2010, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I will serve all counsel of record electronically or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Kevin M. Sadler
Kevin M. Sadler

CERTIFICATE OF CONFERENCE

Counsel for the Receiver has conferred with the parties impacted by this motion, who have agreed to the motion and the relief requested herein as evidence by the signatures above.

/s/ Kevin M. Sadler
Kevin M. Sadler